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August 18, 2024

## **BY ELECTRONIC MAIL & ECF**

The Honorable Victor Marrero United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v Villafane, Juan Kuang 21 cr 93 (VM) USDC SDNY
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DOC #:\_\_\_\_
DATE FILED: 8/19/24

## Dear Judge Marrero:

Mr. Juna Kuang is released on a \$150,00 bond with condition of home detention with GPS monitoring, secured by \$150,000, cash of \$5,000, and signatures of seven suretorsconsisting of family members and his supervisor from work. See Dkt. Entry # 132

Mr. Kuang seeks a temporary amendment to his conditions of bond to allow him on August 30<sup>th</sup>, to be out of his home from 10:00 am until 7:00 pm to celebrate his son's first birthday party at his mother's home (his mother is a suretor). All details of this party, including the address of where the party is being held have been provided to pretrial services and the Government.

Mr. Kuang's pretrial officer, Officer Marlon Ovailes has consented to this request and the Government has deferred to Pretrial's position. Officer Ovailes reports that Mr. Kuang is completely compliant with all his conditions of bond, including employment, reporting to Pretrial Services, drug tests negative for drug use, and attendance at his treatment. Accordingly, I respectfully request the Court grant a temporary amendment to Mr. Kuang's conditions of bond to allow him on August 30<sup>th</sup> to be out of his home from 10:00 am to 7 PM to attend his son's birthday party, to help set up the party and assist in cleaning up after the party.

Respectfully submitted,
/s/
Donna R. Newman
Cc: PTO Marlon Ovailes
AUSA Michael Herman
AUSA Thomas Wright

